UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

DAMAKA, INC.,
Patent Owner.

IPR2026-00211
U.S. Patent No. 12,279,116

PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL

I. INTRODUCTION

Petitioner Cisco Systems, Inc. ("Cisco") respectfully seeks PTAB review of the '116 patent because discretionary denial would undermine key institutional interests recognized by the Director, including the protection of U.S. manufacturing interests and correction of material examination error. Institution is further supported by *Fintiv* factors favoring review:

- **Cisco's Contributions to American Manufacturing, Jobs, and Infrastructure**: Webex—the accused product in the copending litigation—is provided through Cisco's American manufacturing investments and represents a substantial investment in American manufacturing. By contrast, Patent Owner provides no contribution to American manufacturing.
- **Correcting the Examiner's Error**: The Examiner allowed the '116 patent and the five other patents asserted in the parallel proceeding without issuing a single prior art rejection.
- ***Fintiv* considerations favor institution**: The copending district court litigation is in early stages, and the district court has not made any meaningful investment in the case. Markman proceedings are scheduled for after institution, and summary judgment motions are not due until many months later.

II. THE FACTS FAVOR REFERRAL

Three considerations independently favor referral: (1) Cisco's U.S.

manufacturing efforts to provide the accused product, as recognized by the Director's recent Memorandum; (2) material examiner error during prosecution of the '116 patent; and (3) Petitioner's diligence and the early stage of copending litigation alleviate efficiency concerns under *Fintiv*.

A. The USPTO Memorandum's manufacturing factors favor institution.

On March 11, 2026, the Director issued a Memorandum entitled "Additional Discretionary Institution Considerations—U.S. Manufacturing and Small Business Use of AIA Proceedings" (the "Memorandum"). The Memorandum recognizes that "the availability of IPRs…is important to protect American manufacturers" and identifies the following factors relevant to institution:

> (1) the extent to which any products accused of infringement in a parallel proceeding are manufactured in the United States or are related to investments in American manufacturing operations;
>
> (2) the extent to which any products made, sold, or licensed by the patent owner that compete with the accused products are manufactured in the United States; and
>
> (3) whether the petitioner is a small business that has been sued for infringement of the patent at issue.

Memorandum, 2.

As discussed below, discretionary denial here would frustrate—not further—the Memorandum's stated purpose. Denial would deprive Petitioner Cisco—an American technology company whose products are built in America and advance U.S. manufacturing operations—of access to PTAB review. By contrast, Patent

Owner Damaka is a software company with no manufacturing operations. The net result of discretionary denial in this IPR would be harm to competition and innovation by U.S. operating companies.

1. The accused product (Webex) is provided by Cisco's American-built equipment and facilities.

The Memorandum's first factor weighs against discretionary denial because the accused product in the copending litigation—Webex—is provided by data center facilities that Cisco built in the U.S. *See* Memorandum, 2-3. The Memorandum explains that the relevant products for method claims are the "devices used to carry out the method." Memorandum, 3. While Webex is accessible through many different types of endpoint devices, Patent Owner's infringement contentions in the copending litigation identify Cisco's data centers and servers as the instrumentalities that allegedly perform the claimed methods mapped to the Webex service. *See* Ex.1020; Exs.1063-1068 (claim charts accompanying infringement contentions mapping Cisco's servers to method claim limitations in all six patents).

Instead of relying on third-party data centers, Cisco invested heavily in U.S. manufacturing to build its own domestic data centers. Exs.1069-1071 (Cisco's Webex-supporting data centers in California, Texas, New York, and Virginia). Building these U.S. data centers has benefitted U.S. construction and

manufacturing industries while at the same time helping to make Webex as reliable, useful, and secure as possible. Discretionary denial under these circumstances would punish—rather than protect—an American company that brings its products to fruition through U.S. manufacturing.

2. Webex is related to investments in American manufacturing.

The Memorandum explains that the Director will also consider the extent to which the accused products are "related to investments in American manufacturing operations." Memorandum, 2. In addition to driving Cisco's own U.S. data center construction, Webex represents a substantial contribution to American manufacturers across the country. Exs.1072-1075. Webex's "Expert on Demand" service provides new tools and solutions specific to manufacturers, who need ready access to skilled workers to maintain, repair, and optimize complex production machinery. Exs.1072-1075. Through augmented reality, Expert on Demand brings industrial engineers into any factory floor location in America to reduce downtime and operational costs. Ex.1073; Ex.1075. Cisco's efforts to develop the Webex Expert on Demand service, including its partnerships with American augmented reality hardware companies like Augmentir, represent a major "investment[] in American manufacturing operations." Ex.1073; Memorandum, 2.

Webex's investments in its U.S. data centers also advance America's national security objectives. *See* Memorandum, 1 (national security concerns

associated with offshoring in America's industries). Recognizing the unique demands for security and reliability in defending U.S. personnel, assets, and information, Cisco developed "Webex for Defense"—a bespoke collaboration platform exclusively available to the United States Department of Defense (DoD). Exs.1076-1078. Webex for Defense is delivered out of Cisco-hosted, DoD IL5-certified data centers located in the United States and supports the DoD's national security systems and mission-critical information across calling, meeting, and messaging workloads. Ex.1077, 2. The National Security Agency (NSA) has recognized that Webex "offers the most complete set of security and privacy tools to help organizations reduce risk across the entire collaboration ecosystem." Ex.1078, 3.

Thus, Cisco's investment in secure domestic data centers and networking infrastructure not only advances America's economic interests, but also its national security interests. *See* Memorandum, 1. Denying Cisco access to IPR review would be inconsistent with the Memorandum's underlying objectives and concerns.

3. Cisco advances American manufacturing.

Cisco is the type of Petitioner the Memorandum is intended to protect because it contributes to building up U.S. manufacturing and the U.S. workforce in many ways. Cisco is an American technology company that designs, manufactures, and sells networking equipment throughout the United States and worldwide.

Cisco has demonstrated its commitment to U.S. manufacturing through its Build America, Buy America ("BABA")-certified products for the BEAD Program, including the manufacture of various products in Carrollton, Texas. Ex.1053. Cisco's products are manufactured through a network of manufacturing partners, several of which maintain substantial operations in the United States. Many of Cisco's preferred component suppliers are U.S.-headquartered companies with domestic manufacturing operations. Ex.1054; Ex.1055; Ex.1056.

Additionally, Cisco has made large, sustained investments to build up the U.S. technology sector overall. Cisco employs over 47,000 workers in the United States. Ex.1057, 8. Cisco further invests in workforce development through initiatives like the Cisco Networking Academy, which has trained millions for U.S. employment. Ex.1058.

Additionally, Cisco supplies critical networking infrastructure for government agencies and to all four branches of the military through Cisco "Gold Partners." Ex.1059. Cisco provides significant support to the nation's network security and artificial intelligence endeavors. Cisco's priorities are to "build modern and resilient infrastructure; protect against the cyber threats of today and tomorrow; and harness the power of AI and data." Ex.1057. Using Cisco's products, "public sector agencies now have new ways to safeguard sensitive data, critical infrastructure, and constituent services." Ex.1060.

Cisco's interest in challenging the validity of the '116 patent is a legitimate effort by an operating company to clear invalid patents that seek to impede—or to tax—Cisco's services to American customers and support for America's tech and manufacturing sectors.

4. Damaka has no U.S. manufacturing operations.

Damaka claims to be a "U.S. manufacturer" but Damaka has not shown that it "manufactures" anything—in America or otherwise. Paper 6 ("DD Req."), 2. Damaka's only product is computer code, and even that relies on work outsourced to India. Ex.2004, ¶¶ 5-7. The Memorandum's second factor weighs against discretionary denial because Damaka does not contribute to American manufacturing at all, let alone manufacture products that compete with the accused products in the copending litigation. Memorandum, 2.

More broadly, Damaka is not the type of Patent Owner the Memorandum was intended to protect. Damaka has not shown that it has any ongoing domestic operations, or even that it *uses* services provided by American companies, for instance American data centers. Accordingly, the protections contemplated by the Memorandum are not intended to shield entities like Damaka from validity challenges brought by companies like Cisco that engage in significant U.S. manufacturing operations and employ a large workforce within the U.S. Because Damaka has no domestic manufacturing that would be disrupted by IPR institution,

the policy rationale underlying the second factor—protecting American manufacturers' reliance on their patent rights—simply does not apply.

5. Denying institution would harm competition and innovation.

Congress created the IPR system to provide an efficient administrative alternative to district court litigation for resolving patent validity disputes. *See* 77 Fed. Reg. 48612 (Aug. 14, 2012); *General Plastic Indus. Co. v. Canon Kabushiki Kaisha*, IPR2016-01357, Paper 19 at 16-17 (Sept. 6, 2017). Denying institution in this case would not protect an American manufacturer—it would shield a software developer with overseas operations from a limited and targeted review of its patent claims for invalidity.

B. The Examiner's prosecution errors warrant referral.

The Examiner allowed the '116 patent—and all five other asserted patents in the same family—to issue without a single prior art rejection. The Examiner gave only a threadbare recitation of supposedly allowable features. Ex.1002, 19-20; *see also* IPR2026-00206, Paper 2 at 10; IPR2026-00207, Paper 2 at 10; IPR2026-00208, Paper 2 at 11; IPR2026-00209, Paper 2 at 11-12; IPR2026-00210, Paper 2 at 10 (Petitions summarizing prosecution histories of related patents).

The absence of even a single prior art rejection for any of the asserted patents (across **ten years** of prosecution) shows that the Examiner failed to meaningfully test the patentability of the claims against the relevant prior art. This

represents material error by the Examiner that led to the '116 patent being granted and thus weighs strongly in favor of institution so that the Office can correct it. *See Ascentcare Dental Prods., Inc. v. Sometex, LLC*, IPR2025-01104, Paper 11 at 2-3 (Oct. 17, 2025) (where "the Office materially erred during prosecution… it is an appropriate use of Office resources to review the potential error.")

The Examiner's perfunctory listing of allowable claim features in the '116 patent is also confusing in light of the Examiner's similar listings for the other asserted patents. For the '116 patent, the Examiner cited features related to a "*function block* [that] *is configured to be compiled into* [a] *superblock application*," and "*application programming interface (API) calls*" between the function block and superblock application as allegedly being absent from the prior art. Ex.1002, 19-20. Yet, when previously reviewing the application that became U.S. Patent No. 9,027,032, the Examiner made an examiner's amendment to independent claim 9 (which already included similar *function block*/*superblock* and *API* features) to add a "*window that is superimposed on a display*." Ex.1079, 17-23. The Examiner did not require such an amendment for the '116 patent. Nor did the Examiner explain why the '116 patent's "*function block*," "*superblock*," and "*API*" features were distinguishable over the prior art, but the '032 patent's similar features apparently were not. The Examiner's inconsistent determinations for similar claim features further suggest that the Examiner lacked a clear

understanding of what distinguished the claims from the prior art.

Thus, the absence of any prior art rejections or substantive analysis for the '116 patent or the five other patents asserted in the parallel proceeding weighs in favor of institution.

C. Patent Owner has earned no settled expectations for the asserted patents.

The '116 patent issued just one year ago, which is not sufficient time to create settled expectations. *See Apple Inc. v. Apex Beam Techs. LLC*, IPR2025-00896, Paper 10 at 2-4 (Sept. 3, 2025) (finding no settled expectations for patents being in force as much as four years).

Patent Owner implies, however, that settled expectations began accruing for the '116 patent when U.S. Patent No. 9,027,032 issued nearly ten years earlier. DD Req., 8. Patent Owner cites no authority or decisions from the Office that support Patent Owner's claim to settled expectations based only on the issue date of an earlier patent in the family. The Office has previously found earlier patents in the family relevant when Petitioner had notice of those earlier patents in the family. *See iRhythm Techs. Inc. v. Welch Allyn Inc*., IPR2025-00363, Paper 10 at 3 (June 6, 2025) (citing "Petitioner's awareness" of the patent applications in the family). Here, however, Patent Owner has not alleged that Petitioner had notice of the '032 patent or any other patents in the family before they were asserted by Patent Owner. *See* DD Req., 8.

Moreover, the Office's goal of correcting examiner errors outweighs any settled expectations Patent Owner claims to have. *See TSMC Ltd. v. Marlin Semiconductor Ltd.*, IPR2025-00847, Paper 11 (Sept. 3, 2025) (referring the IPR where the examiner error outweighed a 15-year-old patent); *Eunsung Global Corp. v. Hydrafacial LLC*, No. IPR2025-00445, Paper 14 (July 10, 2025) (referring the IPR where examiner error outweighed settled expectations of a 9-year-old patent); *FreightCar Am., Inc. v. Nat'l Steel Car Ltd*., IPR2025-01046, Paper 20 (Oct. 10, 2025) (referring a case where the Examiner error outweighed settled expectations of a 13-year-old patent); *Anthony Inc. v. ControlTec LLC*, IPR2025-00636, Paper 9 at 2 (July 16, 2025) (material error overcame 17–18 years of settled expectations).

Thus, the short amount of time that has passed since the issuance of the '116 patent, combined with the Examiner's material error explained above, weigh in favor of reviewing the '116 patent and outweigh any settled expectations that Patent Owner claims to have.

D. The *Fintiv* factors discussed by Patent Owner weigh against discretionary denial.

As explained above, Cisco's manufacturing contributions and the Examiner's material error "serve the interest of overall system efficiency and integrity." *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 at 15 (Mar. 20, 2020) (precedential). The other factors discussed in *Fintiv* and referenced in Patent

Owner's Request also do not warrant discretionary denial. *See* DD Req., 2-7. As explained below, the relevant *Fintiv* factors either favor institution or are neutral.

1. <u>There has been minimal investment in the parallel proceeding.</u>

The co-pending litigation is in its early stages, and Petitioner acted diligently to file its petition. Although the parties have exchanged contentions and commenced fact discovery, no claim construction briefing or hearing has occurred, no dispositive motions have been filed, and trial is still over a year away. There will be no claim construction briefing or hearing until well after institution. Preliminary claim constructions are due on July 14, 2026, and the Markman hearing is scheduled for October 27, 2026—more than three months after the Board's expected institution decision deadline of July 20, 2026. Ex.2001, 4.

Per *Fintiv*, "[i]f, at the time of the institution decision, the district court has not issued orders related to the patent at issue in the petition, this fact weighs against exercising discretion to deny institution." *Fintiv*, 10. Here, the court will therefore not issue an order related to claim construction until long after the institution decision is set to occur. Thus, the early stage of the parallel proceeding in which there has been minimal investment by the parties, and the lack of any order addressing a dispute related to the '116 patent, weigh against discretionary denial.

2. Petitioner diligently filed the Petition within two months of receiving Patent Owner's infringement contentions.

Petitioner's diligence in filing six IPR petitions, including the instant Petition, within two months of receiving Patent Owner's infringement contentions also weighs against denial. *Fintiv*, 11. The Office has recently agreed that similar diligence is reasonable and weighs against denial. *See Samsung Elecs. Co. v. Mullen Indus. LLC,* IPR2024-01472, Paper 9 at 10 (Mar. 31, 2025) ("Petitioner's diligence in filing its Petition (a) less than five months after receiving Patent Owner's infringement contentions and (b) prior to the parties briefing claim construction issues weighs against exercising discretionary denial."); *see also Samsung Elecs. Co. v. Headwater Rsch. LLC*, IPR2024-01396, Paper 13 at 7 (Apr. 1, 2025) ("[W]e find Petitioner's diligence in filing its Petition approximately 4 months before it was statutorily required to do so, and while litigation is in its early stages, weighs against denial, not for it.").

3. Trial is scheduled around the projected statutory deadline for a Final Written Decision.

Trial is currently set for April 19, 2027, which is three months before the projected due date for the Final Written Decision. Ex.2001, 4. However, it is uncertain that the district court trial will begin on the scheduled date. Six other cases are currently scheduled for jury selection on April 19, 2027, making it unlikely that this case will proceed to trial that day. Ex.1062. The Office has

recognized that scheduled trial dates are not immutable. *See Boe Tech. Grp. Co. v. Optronic Sci. LLC*, IPR2024-01130, Paper 16 at 10 (Jan. 27, 2025) ("Because a number of cases are scheduled for jury selection on January 5, 2026 in addition to the parallel proceeding, there is some uncertainty whether the trial in that proceeding would actually begin on that date."). The median time-to-trial in E.D. Texas is currently 24 months, and that figure has been steadily climbing over the past several years. Ex.1061, 35. That statistic predicts a trial date around the first week of June 2027. The realistic prospect of further delay suggests that trial would likely happen around the same time the Board issues an FWD in this proceeding. Accordingly, this factor is neutral.

4. <u>The parallel litigation involves substantially the same claims and parties.</u>

Cisco is a defendant in parallel litigation brought by Patent Owner involving substantially the same claims. *See* DD Req., 4-5. That is true of most IPR petitioners, therefore, this factor is neutral. *See HP Inc. v. Slingshot Printing LLC*, IPR2020-01084, Paper 13 at 9 (Jan. 14, 2021); *see also NVIDIA Corp. v. Invensas Corp*., IPR2020-00603, Paper 11 at 23 (Sept. 3, 2020) (this factor weighs against discretionary denial where the district court trial and IPR final written decision are expected "around the same time").

In summary, the *Fintiv* factors are either neutral or weigh against discretionary denial, and the factors considered holistically support institution.

E. Patent Owner's allegation of "inconsistent claim construction positions" is false: Petitioner has not proposed any claim constructions in either proceeding.

Patent Owner alleges that Petitioner has taken "inconsistent claim construction positions." DD Req., 7. But Patent Owner's own statements prove that is not true; Petitioner has not proposed any claim constructions in this proceeding and claim construction briefing in the copending litigation will not be shared for months. DD Req., 6-7. Instead, Patent Owner's argument seems to be based on Petitioner's invalidity contentions in the copending litigation listing 35 U.S.C. § 112(b) as one of the grounds for invalidity in the district court, while the Petition does not raise § 112(b) as a ground in this IPR. DD Req., 7. This argument is inapposite because § 112(b) is not available as a ground for IPR proceedings. For example, in *Carbyne, Inc. v. Tritech Software Systems*, which Patent Owner cites in its Request, the Director's decision referred to the petitioner's district court **claim constructions**—not invalidity grounds—being inconsistent with its IPR claim construction positions. *See* IPR2025-00959, Paper 20 at 2-4 (Feb. 19, 2026); DD Req., 7. As Patent Owner acknowledges, there has been no such claim construction briefing exchanged in the parallel litigation here. DD Req., 6-7.

III. PATENT OWNER IDENTIFIES NO SUBSTANTIVE WEAKNESSES IN THE PETITION.

Patent Owner does not identify any substantive weakness in the Petition's grounds. Patent Owner vaguely suggests that the Petitioner's number of Grounds

and references is excessive. DD Req., 3. Patent Owner cites no authority supporting its conclusion that the Petition's grounds including combinations of four total references is too burdensome for the Board to manage. More importantly, Patent Owner's argument relates to factual matters that are for the Board to determine at trial.

IV. CONCLUSION

Together, Cisco's substantial U.S. manufacturing investments, the presence of material examiner error, and the *Fintiv* factors provide compelling reasons to institute review and permit the Office to assess the validity of the '116 patent on the merits.

Respectfully submitted,

Date: April 20, 2026

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PETITIONER'S EXHIBIT LIST

Ex.1001	U.S. 12,279,116
Ex.1002	Prosecution History of U.S. 12,279,116
Ex.1003	Declaration of Bruce McNair under 37 C.F.R. § 1.68
Ex.1004	*Curriculum Vitae* of Bruce McNair
Ex.1005	U.S. 2011/0249077 to Abuan et al.
Ex.1006	U.S. 8,396,490 to Platt et al.
Ex.1007	U.S. 2012/0092438 to Guzman Suarez et al.
Ex.1008	U.S. 5,689,641 to Ludwig et al.
Ex.1009	D. E. Knuth, Selected Papers on Computer Science (Cambridge Univ. Press), 1996
Ex.1010	B. W. Boehm, Software Engineering Economics (Prentice-Hall, Inc.), 1981
Ex.1011	U.S. 5,339,431
Ex.1012	U.S. 5,615,400
Ex.1013	U.S. 5,946,486
Ex.1014	U.S. 6,243,764
Ex.1015	U.S. 5,802,367
Ex.1016	U.S. 5,218,697
Ex.1017	U.S. 5,498,003
Ex.1018	U.S. 6,163,858
Ex.1019	U.S. 2010/0066807 to Eisenberg et al.
Ex.1020	Plaintiff's Disclosure of Asserted Claims and Infringement Contentions, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-

	00593 (E.D. Tex. Nov. 13, 2025).
Ex.1021	U.S. 2008/0178264
Ex.1022	U.S. 2005/0235044
Ex.1023	U.S. 2006/0037064
Ex.1024	U.S. 2008/0201438
Ex.1025	U.S. 2012/0170722
Ex.1026	U.S. 2005/0265322
Ex.1027	U.S. 6,314,402
Ex.1028	U.S. 2005/0060183
Ex.1029	U.S. 2009/0193394
Ex.1030	U.S. 2008/0022327
Ex.1031	U.S. 2002/0199019
Ex.1032	U.S. 6,101,607
Ex.1033	U.S. 6,311,283
Ex.1034	U.S. 6,295,048
Ex.1035	U.S. 2009/0310023
Ex.1036	U.S. 2008/0127183
Ex.1037	U.S. 7,574,202
Ex.1038	U.S. 7,461,144
Ex.1039	U.S. 2007/0185998
Ex.1040	U.S. 6,820,235
Ex.1041	RFC 3264

Ex.1042	U.S. 9,058,655
Ex.1043	Apple Newsroom, "Apple Announces iPhone 2.0 Software Beta," 2008 (retrieved from https://www.apple.com/newsroom/ 2008/03/06Apple-Announces-iPhone-2-0-Software-Beta/)
Ex.1044	The Big Blog, "Skype now available for Android phones," 2010 (retrieved from https://web.archive.org/web/20101006000452/ http://blogs.skype.com/en/2010/10/ android.html)
Ex.1045	U.S. 2012/0019610
Ex.1046	U.S. 2013/0290982 to Beilis et al.
Ex.1047	Chart comparing claims 1-27 with claims 28-54 in redline
Ex.1048	iOS Reference Library, "Core Media Framework Reference," 2010 (retrieved from https://web.archive.org/web/20100906024157/ http://developer.apple.com/iphone/library/documentation/ CoreMedia/Reference/CoreMediaFramework/index.html#// apple_ref/doc/uid/TP40009756)
Ex.1049-1052	*Reserved*
Ex.1053 (NEW)	**Cisco Build America, Buy America (BABA) Certification**
Ex.1054 (NEW)	**Cisco Supplier List**
Ex.1055 (NEW)	**Flex Honored as Cisco's EMS Partner of the Year**
Ex.1056 (NEW)	**Flex Domestic Manufacturing**
Ex.1057 (NEW)	**Cisco 10-k form**
Ex.1058 (NEW)	**Cisco Networking Academy Impact**
Ex.1059 (NEW)	**Cisco GEMSS Contract Details**

Ex.1060 (NEW)	**Cisco Public Sector Highlights**
Ex.1061 (NEW)	**Federal District Court Caseload Management Statistics – December 2025**
Ex.1062 (NEW)	**EDTX Docket for April 19, 2027**
Ex.1063 (NEW)	**Plaintiff's Claim Chart for US Patent No. 9,027,032 Against Accused Cisco Products, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-00593 (E.D. Tex. Nov. 13, 2025)**
Ex.1064 (NEW)	**Plaintiff's Claim Chart for US Patent No. 9,578,092 Against Accused Cisco Products, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-00593 (E.D. Tex. Nov. 13, 2025)**
Ex.1065 (NEW)	**Plaintiff's Claim Chart for US Patent No. 9,270,744 Against Accused Cisco Products, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-00593 (E.D. Tex. Nov. 13, 2025)**
Ex.1066 (NEW)	**Plaintiff's Claim Chart for US Patent No. 11,576,046 Against Accused Cisco Products, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-00593 (E.D. Tex. Nov. 13, 2025)**
Ex.1067 (NEW)	**Plaintiff's Claim Chart for US Patent No. 11,930,362 Against Accused Cisco Products, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-00593 (E.D. Tex. Nov. 13, 2025)**
Ex.1068 (NEW)	**Plaintiff's Claim Chart for US Patent No. 12,279,116 Against Accused Cisco Products, *Damaka, Inc. v. Cisco Systems, Inc.*, No. 2:25-cv-00593 (E.D. Tex. Nov. 13, 2025)**
Ex.1069 (NEW)	**Webex Data Centers and iPOP Locations**
Ex.1070 (NEW)	**Cisco Webex Meetings Clusters and Data Center Locations**
Ex.1071 (NEW)	**Cisco Webex Meetings Security White Paper**
Ex.1072 (NEW)	**Webex Expert on Demand is Transforming Work for Frontline Workers**

Ex.1073 (NEW)	**Augmentir and Cisco Partnership – Expert on Demand**
Ex.1074 (NEW)	**Webex Expert on Demand**
Ex.1075 (NEW)	**Webex Blog - Empowering Frontline Workers with Webex Expert on Demand**
Ex.1076 (NEW)	**Webex for Defense**
Ex.1077 (NEW)	**Webex Blog – Bringing the Best of Webex to Defense**
Ex.1078 (NEW)	**Webex Blog – Webex Announces Cloud Collaboration Solution for National Security and Defense**
Ex.1079 (NEW)	**Prosecution History of U.S. 9,027,032**

CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service April 20, 2026

Manner of service Electronic Email: jostling@fabricantllp.com; PTAB@fabricantllp.com; ffabricant@fabricantllp.com; rcowell@fabricantllp.com; jmercadante@fabricantllp.com

Documents served ***PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL; EXHIBITS Ex.1053 – Ex.1079.***

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